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11 *Attorneys for Defendants Tesla, Inc., Elon Musk,*  
12 *Brad W. Buss, Robyn Denholm, Ira Ehrenpreis,*  
13 *Antonio J. Gracias, James Murdoch, Kimbal Musk,*  
14 *And Linda Johnson Rice*

15 UNITED STATES DISTRICT COURT  
16 NORTHERN DISTRICT OF CALIFORNIA  
17 SAN FRANCISCO DIVISION

18 IN RE TESLA, INC. SECURITIES  
19 LITIGATION

Case No. 3:18-cv-04865-EMC

**[PROPOSED] ORDER GRANTING  
DEFENDANT'S RENEWED  
ADMINISTRATIVE MOTION TO SEAL**

THE COURT, having considered Defendants Tesla, Inc., Elon Musk, Brad W. Buss, Robyn Denholm, Ira Ehrenpreis, Antonio J. Gracias, James Murdoch, Kimbal Musk, and Linda Johnson Rice (together, “Defendants”) Renewed Administrative Motion to File Under Seal certain confidential excerpts of and exhibits and testimony cited in the Parties’ pleadings related to Plaintiff’s Partial Motion for Summary Judgment (Dkt. No. 352), the Declaration of Nathaniel Smith, the Court’s April 1, 2022 Order (Dkt. No. 387), and all other filings in this case, has found:

(1) There exist compelling reasons to seal these materials that overcome the right of public access to these materials;

(2) A substantial probability exists that the overriding interest will be prejudiced if these materials are not sealed;

(3) The proposed sealing is narrowly tailored; and

(4) No less restrictive means exist to achieve the overriding interest (CRC 2.550(d));

**HEREBY ORDERS THAT:**

Because the documents listed below contain material that is sealable pursuant to Northern District of California Civil Local Rule 79-5, Defendants’ Renewed Administrative Motion to Seal is hereby **GRANTED** as follows:

Document	Dkt. No.	Portion	Ruling
Plaintiff’s Partial Motion for Summary Judgment	352	Updated redactions	
Defendants’ Opposition to Partial Motion for Summary Judgment	365	Updated redactions	
Reply in Support of Partial Motion for Summary Judgment	370	Updated redactions	
Exhibit 41	369-2; 371-10	Updated redactions	
Exhibit 44	351-4; 352-25	Sealed in full	
Exhibit 45	351-5; 352-26	Sealed in full	
Exhibit 46	351-6; 352-27	Sealed in full	
Exhibit 47	351-7; 352-28	Sealed in full	
Exhibit 58	351-8; 352-29	Updated redactions	
Exhibit 79	351-9; 352-30	Updated redactions	
Exhibit 90	351-13; 352-35	Sealed in full	

Exhibit 91	351-14; 352-36	Updated redactions	
Exhibit 121	351-24; 352-46	Updated redactions	
Exhibit 147	351-26; 352-48	Sealed in full	
Exhibit 155	351-29; 352-51	Sealed in full	
Exhibit 157	351-30; 352-52	Updated redactions	
Exhibit 158	351-31; 352-53	Updated redactions	
Exhibit 165	351-32; 352-54	Updated redactions	
Excerpts from the Deposition of Joseph Fath	352-6	Updated redactions	
Excerpts from the Deposition of Nii Owuraka Koney	351-45; 352-8	Sealed in full	
Excerpts from the Deposition of Martin Viecha	351-47; 352-11	Updated redactions	
Excerpts from the Deposition of Elon Musk	365-1 (Ex. B)	Updated redactions	
Excerpts from the Deposition of Deepak Ahuja	365-1 (Ex. E)	Updated redactions	
Excerpts from the Deposition of Joseph Fath	371-4	Updated redactions	

**IT IS SO ORDERED.**

DATED: \_\_\_\_\_, 2022

By \_\_\_\_\_  
Honorable Edward M. Chen